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19 THOMAS RAY WOODSON

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 OAKLAND DIVISION

23 THOMAS RAY WOODSON,

24 Plaintiff,

25 v.

26 J. RODRIGUEZ, *et al.*,
27 Defendants.

Case No. 4:07-CV-04925-CW

**STIPULATION AND ORDER
EXTENDING DISCOVERY CUT-OFF
FOR EXPERT WITNESSES**

Judge: The Honorable Claudia Wilken

Complaint Filed: September 21, 2007

Trial Date: June 27, 2011

Pursuant to Northern District Local Rules 7-12 and 16-2, counsel for Plaintiff Thomas R. Woodson and counsel for Defendants J. Rodriguez, E. Camarena, J. Parra, D. Vega, and Sergeant Kircher hereby submit this Stipulation and Proposed Order to extend the expert discovery cut-off for medical experts.

The Parties previously agreed to extend the case management dates, as set forth in the stipulated order adopted by this Court on January 14, 2011 (Dkt. 107);

On January 14, 2011, the parties disclosed their proposed medical and non-medical expert witnesses;

On January 25, 2011, counsel for Defendant sent a letter to Counsel for Plaintiff supplementing its June 28, 2010 responses to Plaintiff's request for production of documents, indicating, for the first time, the existence of three x-ray scans and two MRI scans for Plaintiff that "cannot be copied, but are available for inspection at High Desert State Prison, 475-750 Rice Canyon Road, Susanville, CA, 96127";

Plaintiff's medical expert, who is located in Huntington Beach, California, will not be able to complete the expert report by the current deadline without review of these x-rays and MRI scans;

The parties are currently meeting and conferring regarding the production of these relevant medical documents after the December 17, 2010 fact discovery cut-off.

IT IS HEREBY STIPULATED AND AGREED by the Parties, by and through their respective counsel, that:

1. The case management dates related to non-medical expert witnesses remain the same as ordered in the January 13, 2011 order.

2. The case management dates related to medical expert witnesses be reset as follows:

Event	Current Deadline	Stipulated Deadline
Medical expert reports	1/28/11	2/11/11
Medical expert rebuttal reports	2/15/11	3/1/11
Medical expert discovery cut-off	3/4/11	3/18/11

3. None of the other case management dates are altered by this stipulation.

Respectfully Submitted,

Dated: January 28, 2011

MATTHEW I. KREEGER
DANIEL P. MUINO
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JANELLE J. SAHOURIA
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By: /s/ Janelle J. Sahouria
JANELLE J. SAHOURIA

Attorneys for Plaintiff
THOMAS RAY WOODSON

Dated: January 28, 2011

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By: /s/ Neah Huynh
NEAH HUYNH

Attorneys for Defendants
J. RODRIGUEZ, E. CAMARENA, J.
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KIRCHER

ECF ATTESTATION

I, JANELLE J. SAHOURIA, am the ECF User whose ID and password are being used to file the following document: STIPULATION AND [PROPOSED] ORDER EXTENDING DISCOVERY CUT-OFF FOR EXPERT WITNESSES. In compliance with General Order 45, X.B., I hereby attest that Neah Huynh has concurred in this filing.

Dated: January 28, 2011

JANELLE J. SAHOURIA
MORRISON & FOERSTER LLP

By: /s/ Janelle J. Sahouria
JANELLE J. SAHOURIA

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2 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**

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4 Dated: 2/1/2011

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6 HONORABLE CLAUDIA WILKEN
7 United States District Court Judge
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